

Safety Evaluation Number<sup>1</sup>: SE-W375-99-00001Revision No: 2ABCN Number: ABCN-W375-99-00020Safety Evaluation Subject: Revision of the ECP Description Document**PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE**

1. Describe the proposed revision (including credible failure modes, if applicable).

A complete revision of "Employee Concerns Program Description and Instructions," BNFL-5193-ECP-01, Revision 0. This document was written for Part A and served as both the program plan and the procedural instructions. The administration of the program has changed for Part B and the procedural instructions have been placed in Project controlled documents (e.g. procedures or codes of practice). To facilitate these changes, Revision 1 was prepared and the name of the document has changed to "Employee Concerns Program Plan." The RU did not accept Revision 1 submitted in ABAR-W375-99-00001, so another revision of the ECP was prepared in addition to a revised ABCN and ABAR. Revision 2 of the ECP is being withdrawn so the ABCN, the ABAR, and the Safety Evaluation are being revised again to reflect the newest revision (3) that is being submitted to the RU.

In addition to the document title change, specific changes are summarized: (a) instructions for evaluation and categorization of a concern have been moved to the ECP Code of Practice; (b) detailed procedure steps for reporting a concern, receiving a concern report, investigating a concern, resolution of the concern, and reporting program status have been moved to the ECP Code of Practice; (c) a single Project ECP Officer position supported by Project ECP coordinator(s) has been created to replace the approach in which partner companies also assumed the responsibility for providing ECP staff in their home offices; (d) the Program plan document continues to establish the framework but the details of specific staff responsibilities have been moved to the ECP Code of Practice; (e) immediate action determination has been moved to the ECP Code of Practice; (f) instructions for reporting to outside agencies have been moved to ECP Code of Practice; (g) investigation guidelines have been moved to the Investigations Code of Practice; (i) forms have been moved to the ECP Code of Practice; (j) clarification that the program is consistent with the contract with DOE.

There are no credible failure modes associated with the ECP or the proposed changes to the ECP. The ECP is an administrative program implemented to assure an anonymous or confidential program that project employees and subcontractors may use to raise safety concerns without fear of retaliation. As such the administration and implementation of the program have no impact on the radiological, process, or nuclear safety of the project.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The proposed change is a complete revision of the Employee Concerns Program Description and Instructions and therefore affects all sections of the AB document. The BNFL Inc. commitment to maintain an effective ECP is maintained in the proposed revision. The majority of the changes involves the relocation of procedural instructions from an AB document to project-controlled documents such as procedures or codes of practice. Attachment 1 is a comparison to the attributes described in RL/REG-96-03, "Guidance for the Review of TWRS Privatization Contractor Employee Concerns Management System." This comparison demonstrates that although many implementing details and other information

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<sup>1</sup> The Safety Evaluation Number shall be obtained from Project Document Control.

Safety Evaluation Number<sup>1</sup>: SE-W375-99-00001 Revision No: 2

ABCN Number: ABCN-W375-99-00020

Safety Evaluation Subject: Revision of the ECP Description Document

are no longer part of the Authorization Basis, the proposed program continues to provide the key elements attributed to an effective program in a manner consistent with the original program. Those attributes that were not provided in the original revision have not been added to the Authorization Basis document submitted for RU approval. Attachment 2 is a comparison of basic attributes of an effective ECP (as described in DOE O 5480.29 and supplemented by additional regulatory commitments) to the proposed Program Plan. The comparison demonstrates that the proposed revision continues to satisfy the contractual requirements in addition to providing an alternate method by which project staff members can raise concerns related to health and safety issues.

3. List the references used for the safety evaluation.

RL/REG-96-03, Rev 0, DOE Order 442.1, DOE G 442.1, DOE 5480.29, DOE/RL-96-0006, the BNFL Contract with the DOE, the SRD, and the ISMP

4. Describe the planned revision implementation schedule.

A. Relocation of procedural instructions: Within 30 days following RU acceptance of ABAR. Upon RU approval of the proposed ECP revision, the instructions will be removed from the AB. At this time the instructions are also included in codes of practice.

B. Identification of Part B ECP staff: The Part B ECP officer and coordinator have been identified to the staff. Their names and phone numbers have been posted in project buildings. This information is not available in revision 0 of the ECP.

C. An ECP was implemented in Part A and remains in effect. The parts of the program that represent changes from the program implemented in Part A involve the identification of ECP staff

In summary, all aspects of the revised ECP will be implemented within 30 days following RU approval of the ABAR

## PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- |   | <u>YES</u>               | <u>NO</u>                           |
|---|--------------------------|-------------------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

JUSTIFICATION:

**The SRD does not address employee concerns issues and nothing in the ECP impacts the content of the SRD**

- |   |                                     |                          |
|---|-------------------------------------|--------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|

JUSTIFICATION:

**Specific details of steps that are followed in the implementation of the Program have been moved from the ECP Description document (an Authorization Basis document) to project**

Safety Evaluation Number<sup>1</sup>: SE-W375-99-00001 Revision No:2                     

ABCN Number: ABCN-W375-99-00020

Safety Evaluation Subject: Revision of the ECP Description Document

YES                      NO

**controlled Codes of Practice. The Regulatory Unit review of the original authorization document may have considered the level of detail related to the programmatic issues as a factor in the approval of the document. Based on this, the proposed change could result in a reduction in commitment as currently described in the Authorization Basis**

3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. ☐ ☒

JUSTIFICATION:

**The changes made to the ECP do not reduce the effectiveness of the program. The process described in the Program is a viable and robust method in which BNFL will maintain an effective and efficient ECP. The program retains the required level of effectiveness following the changes discussed because it maintains the essential elements that are required in the ECP. The changes in the ECP will not adversely affect how the RPP-WTP Facility will be designed, constructed, operated, maintained, and deactivated. These activities will continue to be conducted in a manner that reasonably assures the protection of the health and safety of the public, workers, co-located workers, and of the environment; compliant with laws, regulations, and contract requirements**

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

### **PART III: SAFETY EVALUATION CONCLUSION**

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

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Evaluator/Originator

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26 April 2000  
Date

Safety Evaluation Number<sup>1</sup>: SE-W375-99-00001

ABCN Number: ABCN-W375-99-00020

Safety Evaluation Subject: Revision of the ECP Description Document

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Reviewer<sup>2</sup>

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Date \_\_\_\_\_

Radiological, Nuclear, and Process Safety Manager

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Date \_\_\_\_\_

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Chair, Project Safety Committee<sup>3</sup>

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Date

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RPP-WTP General Manager<sup>3</sup>

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Date

<sup>2</sup> The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

<sup>3</sup> This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.